

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Homer R. Daney  <u>Debtor(s)</u>  The Bank of New York Mellon Trust Company, NA, fka The Bank of New York Trust Company, NA, as successor to JPMorgan Chase Bank, NA, as trustee, in trust for the Holders of Truman Mortgage Loan Trust 2002-1, Asset-Backed Certificates, Series 2002-1  <u>Movant</u>  vs.  Homer R. Daney  <u>Debtor(s)</u>  Scott F. Waterman  <u>Trustee</u>	CHAPTER 13  NO. 22-13306 PMM  11 U.S.C. Section 362
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**NOTICE OF MOTION, RESPONSE DEADLINE  
AND RE-LISTED HEARING DATE**

The Bank of New York Mellon Trust Company, NA, fka The Bank of New York Trust Company, NA, as successor to JPMorgan Chase Bank, NA, as trustee, in trust for the Holders of Truman Mortgage Loan Trust 2002-1, Asset-Backed Certificates, Series 2002-1 has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer, the United States Bankruptcy Judge, in Courtroom 1 at the United States Bankruptcy Court, Office of the Clerk, Room 103, 4<sup>th</sup> Floor Courtroom, The Gateway Building, 201 Penn Street, Suite 300, Reading, PA 19601 on **September 5, 2023**, at **10:00am** or as soon thereafter as counsel can be heard, to consider the motion.

2. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

3. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed an answer.

August 18, 2023

/s/ Michael P. Farrington, Esquire

Michael P. Farrington, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532  
(215) 627-1322 FAX (215) 627-7734  
Attorney for Movant/Applicant

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Homer R. Daney

Debtor(s)

The Bank of New York Mellon Trust Company, NA, fka  
The Bank of New York Trust Company, NA, as  
successor to JPMorgan Chase Bank, NA, as trustee, in  
trust for the Holders of Truman Mortgage Loan Trust  
2002-1, Asset-Backed Certificates, Series 2002-1

Movant

Vs.

Homer R. Daney

Debtor(s)

Scott F. Waterman

Trustee

CHAPTER 13

NO. 22-13306 PMM

11 U.S.C. Section 362

**CERTIFICATE OF SERVICE**

I, Michael P. Farrington, attorney for The Bank of New York Mellon Trust Company, NA,  
fka The Bank of New York Trust Company, NA, as successor to JPMorgan Chase Bank, NA, as  
trustee, in trust for the Holders of Truman Mortgage Loan Trust 2002-1, Asset-Backed Certificates,  
Series 2002-1 do hereby certify that true and correct copies of the NOTICE OF MOTION,  
RESPONSE DEADLINE AND RE-LISTED HEARING DATE have been served on August 18,  
2023, by first class mail, postage prepaid upon those listed below:

Debtor(s)

Homer R. Daney  
510 Nazareth Pike  
Nazareth, PA 18064

Trustee

Scott F. Waterman  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606  
**VIA ECF**

Attorney for Debtor(s)

JOHN R.K. SOLT  
John R. K. Solt, P.C.,  
Gateway Professional Center  
2045 Westgate Drive, Suite 404B  
Bethlehem, PA 18017  
**VIA ECF**

Us Trustee

United States Trustee  
Office of United States Trustee  
Robert N.C Nix Federal Building  
900 Market Street  
Suite 320  
Philadelphia, PA 19107  
**VIA ECF**

/s/ Michael P. Farrington, Esquire

Michael P. Farrington, Esquire  
Attorney for Movant/Applicant

Date: August 18, 2023